

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO)	
WHOLESALE WATER RATES CHARGED BY)	
THE CITY OF CARLISLE TO SHARPSBURG)	CASE NO.
WATER DISTRICT AND NICHOLAS COUNTY)	2021-00382
WATER DISTRICT PURSUANT TO KRS 278.200,)	
KRS 278.160, KRS 278.180, KRS 278.190 AND)	
807 KAR 5:011)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO NICHOLAS COUNTY WATER DISTRICT

Nicholas County Water District (Nicholas District), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than January 24, 2022. The Commission directs Nicholas District to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Nicholas District shall make timely amendment to any prior response if Nicholas District obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Nicholas District fails or refuses to furnish all or part of the requested information, Nicholas District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Nicholas District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Confirm that Harrison County Water Association is the only entity to which Nicholas District sells wholesale water. If not, provide any other entities to which Nicholas District sells wholesale water.

2. Provide the rate schedule of all charges Nicholas District assesses its wholesale customers.

3. Provide the last time Nicholas District's rates to its wholesale customers were revised and explain how the new rate was calculated, including any supporting documentation for the calculation of the new rates.

4. Refer to the Direct Testimony of Gayle Haney, Exhibit B, the spreadsheet calculating the alleged overbilling by the city of Carlisle. Provide a similar spreadsheet showing what Carlisle billed Nicholas District for the period of January 2020 to present versus what Carlisle should have billed Nicholas District based on the tariff on file with the Commission.

5. State what rate the city of Carlisle is currently charging Nicholas District.

6. For the effective time period of the Water Purchase Agreement, provide all the rates that the city of Carlisle has charged Nicholas District.

7. For the effective time period of the Water Purchase Agreement, state if city of Carlisle has provided any credits or refunds for overpayment to Nicholas District.

8. Specifically state what months Nicholas District has purchased more than 4 million gallons from the city of Carlisle in the last five years, and how much water was purchased those months.



Linda C. Bridwell, PE
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Public Service Commission
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DATED JAN 06 2022

cc: Parties of Record

Case No. 2021-00382

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